

Agency D&L

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August 9, 2019

Spectrum Chemical Mfg. Corp.
Attn: Chief Executive Officer
769 Jersey Avenue
New Brunswick, New Jersey 08901

Re: **60-DAY NOTICE OF VIOLATION OF CALIFORNIA LAW**
D&L File No. 61234.11

Dear Executives of Spectrum Chemical Mfg. Corp.,

Your company is in violation of California's Proposition 65, "The Safe Drinking Water and Toxic Enforcement Act of 1986." We represent Maria Elizabeth Romero, a California resident and concerned citizen who intends to file suit against you in the public interest if this matter is not resolved within 60 days.

Enclosed with this letter for your information is a copy of a Proposition 65 Summary prepared by California's Office of Environmental Health Hazard Assessment.

This Notice details three types of violations by Spectrum Chemical Mfg. Corp. ("Spectrum"). First, Spectrum directly sells its products online to consumers via its own Web site, without clear and reasonable warnings of carcinogenicity and reproductive harm. Secondly, Spectrum sells third-party products online to consumers via its Web site, without clear and reasonable warnings of carcinogenicity and reproductive harm. Thirdly, Spectrum sells products online to consumers via its Web site with toxicity warnings which do not comply with current California law. These violations result in the exposure of individuals located in California to toxic chemicals without warning, and are further described below.

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I. Sales Without Warning.

Spectrum sells high-purity chemical products directly to consumers via the Web site located at <https://www.spectrumchemical.com>. Products sold via the referenced Web site include both chemicals manufactured or imported by Spectrum, and ones manufactured or imported by other companies, including TCI America and SPEX CertiPrep. “Listed Chemicals” are those substances which the State of California has recognized as causing cancer, birth defects, or other reproductive harm. The following products are sold by Spectrum via the referenced Web site without adequate warning, in violation of the requirements of Proposition 65.

PRODUCTS:	All products sold by Spectrum via the referenced Web site which contain a Listed Chemical in a purity of 10 percent or higher, whether in solid form or in solution, and are sold without the prominent display of a Proposition 65-compliant warning prior to completion of the purchase.
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ROUTES OF EXPOSURE:	Dermal contact, ingestion and inhalation
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DATES OF EXPOSURE:	Between August 31, 2018 and August 9, 2019
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II. Sales With Inadequate Warning.

As of the date of this Notice, certain products sold on the referenced Web site include purported Proposition 65 warnings, which are ineffective because they do not comply with California’s requirements for “safe harbor warnings” and are not adequately specific. We direct your attention to Title 27 of the California Code of Regulations, section 25603, for information on current requirements for toxicity warnings.

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Please take notice that the following products are sold via the Web site at <https://www.spectrumchemical.com> in violation of the requirements of Proposition 65.

PRODUCTS: All products sold by Spectrum via the referenced Web site which contain a Listed Chemical in a purity of 10 percent or higher, whether in solid form or in solution, and are offered via a product display page containing the following language:
(1) **WARNING:** This product contains a chemical known to the State of California to cause cancer, or
(2) **WARNING:** This product contains a chemical known to the State of California to cause birth defects or other reproductive harm.

ROUTES OF EXPOSURE: Dermal contact, ingestion and inhalation

DATES OF EXPOSURE: Between August 31, 2018 and August 9, 2019

We further request that Spectrum review its records to ensure that all “short-form” Proposition 65 warnings on the referenced Web site comply with the requirements of 27 CCR § 25602(b); specifically, please confirm that short-form warnings are only given online where also included on product labels.

III. All Sales.

Since August 30, 2018, California law has required that a clear and reasonable warning be provided to consumers buying any product online which contains a Listed Chemical, prior to completion of the purchase. Manufacturers and importers have primary responsibility for ensuring that compliant warnings are provided at all stages of the supply chain.

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Online records confirm that Spectrum sells chemicals to a number of educational institutions in California, including member schools of the University of California system. Sales of the referenced products to educational institutions without adequate warnings have resulted in the exposure of individuals in the State to Listed Chemicals. We specifically provide notice that Spectrum's sales of the referenced products to academic laboratories located in California result in the exposure of students and members of the public to Listed Chemicals without warning. With a new school year starting, it is imperative that Spectrum update its sales listings immediately to provide compliant warnings.

Spectrum has exclusive custody of information showing its online sales to residents of California. However, to ensure that the types of product referenced above are described with enough specificity to enable you to remedy the violations of California law, we provide the following Attachments:

- (1) Enclosed as Attachment "B" is a non-exhaustive list of Spectrum products sold on the referenced Web site without warning (as examples for your information);
- (2) Enclosed as Attachment "C" is a non-exhaustive list of third-party products sold by Spectrum on the referenced Web site without warning (as examples);
- (3) Enclosed as Attachment "D" is a non-exhaustive list of products sold by Spectrum on the referenced Web site with a non-compliant warning (as examples); and
- (4) Enclosed as Attachment "E" for your reference is a complete list of Listed Chemicals (which, when sold in a purity of 10 percent or higher in products via the referenced Web site, as referenced above, require a Proposition 65-compliant warning).

Your violation of California law exposes Spectrum to substantial civil liability. A court may impose penalties of up to \$2,500 *per day* for each violation. Since well over 300 days have passed since regulations requiring online warnings became effective on August 31, 2018, and its online offerings for thousands of products violate the law, Spectrum's potential liability is enormous.

The purpose of Proposition 65 is to protect the citizens of the State of California from unwitting exposure to reproductive harm and carcinogenic substances. Accordingly, private settlement of this matter will require your agreement to: (1) provide Proposition 65-compliant warnings to California residents prior to internet sales of the products described above; and (2) require that any entity in the supply chain for consumer sales of your products also provide compliant warnings. Any settlement agreement will also contain an enforcement mechanism providing for substantial penalties in case of non-compliance.

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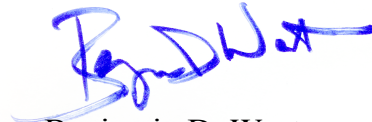
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Attached hereto is an executed Certificate of Merit confirming Spectrum's violation of Proposition 65 described above. The Attorney General of the State of California, all District Attorneys in the State, and City Attorneys for California cities with more than 750,000 residents have received a copy of this Notice and may bring suit against you within 60 days of the date of this Notice. Any settlement of the violations described above is subject to approval by the Attorney General of the State of California.

To prevent the necessity of resolving this matter through litigation, we would be grateful for your prompt attention to these matters.

Very truly yours,



Benjamin D. Weston

Enclosures:

Proposition 65 Summary (Spectrum copy only)
Attachments B through E
Certificate of Merit
Statement of Facts (A.G. copy only)
Service List

CCs:

See Service List

APPENDIX A

OFFICE OF ENVIRONMENTAL HEALTH HAZARD ASSESSMENT CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY

The following summary has been prepared by the California Office of Environmental Health Hazard Assessment (OEHHA), the lead agency for the implementation of the Safe Drinking Water and Toxic Enforcement Act of 1986 (commonly known as “Proposition 65”). A copy of this summary must be included as an attachment to any notice of violation served upon an alleged violator of the Act. The summary provides basic information about the provisions of the law, and is intended to serve only as a convenient source of general information. It is not intended to provide authoritative guidance on the meaning or application of the law. The reader is directed to the statute and OEHHA implementing regulations (see citations below) for further information.

FOR INFORMATION CONCERNING THE BASIS FOR THE ALLEGATIONS IN THE NOTICE RELATED TO YOUR BUSINESS, CONTACT THE PERSON IDENTIFIED ON THE NOTICE.

The text of Proposition 65 (Health and Safety Code Sections 25249.5 through 25249.13) is available online at: <http://oehha.ca.gov/prop65/law/P65law72003.html>. Regulations that provide more specific guidance on compliance, and that specify procedures to be followed by the State in carrying out certain aspects of the law, are found in Title 27 of the California Code of Regulations, sections 25102 through 27001.¹ These implementing regulations are available online at: <http://oehha.ca.gov/prop65/law/P65Regs.html>.

WHAT DOES PROPOSITION 65 REQUIRE?

The “Proposition 65 List.” Under Proposition 65, the lead agency (OEHHA) publishes a list of chemicals that are known to the State of California to cause cancer and/or reproductive toxicity. Chemicals are placed on the Proposition 65 list if they are known to cause cancer and/or birth defects or other reproductive harm, such as damage to

¹ All further regulatory references are to sections of Title 27 of the California Code of Regulations unless otherwise indicated. The statute, regulations and relevant case law are available on the OEHHA website at: <http://www.oehha.ca.gov/prop65/law/index.html>.

female or male reproductive systems or to the developing fetus. This list must be updated at least once a year. The current Proposition 65 list of chemicals is available on the OEHHA website at: http://www.oehha.ca.gov/prop65/prop65_list/Newlist.html.

Only those chemicals that are on the list are regulated under Proposition 65. Businesses that produce, use, release or otherwise engage in activities involving listed chemicals must comply with the following:

Clear and reasonable warnings. A business is required to warn a person before “knowingly and intentionally” exposing that person to a listed chemical unless an exemption applies. The warning given must be “clear and reasonable.” This means that the warning must: (1) clearly make known that the chemical involved is known to cause cancer, or birth defects or other reproductive harm; and (2) be given in such a way that it will effectively reach the person before he or she is exposed to that chemical. Some exposures are exempt from the warning requirement under certain circumstances discussed below.

Prohibition from discharges into drinking water. A business must not knowingly discharge or release a listed chemical into water or onto land where it passes or probably will pass into a source of drinking water. Some discharges are exempt from this requirement under certain circumstances discussed below.

DOES PROPOSITION 65 PROVIDE ANY EXEMPTIONS?

Yes. You should consult the current version of the statute and regulations (<http://www.oehha.ca.gov/prop65/law/index.html>) to determine all applicable exemptions, the most common of which are the following:

Grace Period. Proposition 65 warning requirements do not apply until 12 months after the chemical has been listed. The Proposition 65 discharge prohibition does not apply to a discharge or release of a chemical that takes place less than 20 months after the listing of the chemical.

Governmental agencies and public water utilities. All agencies of the federal, state or local government, as well as entities operating public water systems, are exempt.

Businesses with nine or fewer employees. Neither the warning requirement nor the discharge prohibition applies to a business that employs a total of nine or fewer employees. This includes all employees, not just those present in California.

Exposures that pose no significant risk of cancer. For chemicals that are listed under Proposition 65 as known to the State to cause cancer, a warning is not required if the business causing the exposure can demonstrate that the exposure occurs at a level that poses “no significant risk.” This means that the exposure is calculated to result in not more than one excess case of cancer in 100,000 individuals exposed over a 70-year lifetime. The Proposition 65 regulations identify specific “No Significant Risk Levels” (NSRLs) for many listed carcinogens. Exposures below these levels are exempt from the warning requirement. See OEHHA's website at: <http://www.oehha.ca.gov/prop65/getNSRLs.html> for a list of NSRLs, and Section 25701 *et seq.* of the regulations for information concerning how these levels are calculated.

Exposures that will produce no observable reproductive effect at 1,000 times the level in question. For chemicals known to the State to cause reproductive toxicity, a warning is not required if the business causing the exposure can demonstrate that the exposure will produce no observable effect, even at 1,000 times the level in question. In other words, the level of exposure must be below the “no observable effect level” divided by 1,000. This number is known as the Maximum Allowable Dose Level (MADL). See OEHHA's website at: <http://www.oehha.ca.gov/prop65/getNSRLs.html> for a list of MADLs, and Section 25801 *et seq.* of the regulations for information concerning how these levels are calculated.

Exposures to Naturally Occurring Chemicals in Food. Certain exposures to chemicals that naturally occur in foods (i.e., that do not result from any known human activity, including activity by someone other than the person causing the exposure) are exempt from the warning requirements of the law. If the chemical is a contaminant² it must be reduced to the lowest level feasible. Regulations explaining this exemption can be found in Section 25501.

Discharges that do not result in a “significant amount” of the listed chemical entering any source of drinking water. The prohibition from discharges into drinking water does not apply if the discharger is able to demonstrate that a “significant amount” of the listed chemical has not, does not, or will not pass into or probably pass into a source of drinking water, and that the discharge complies with all other applicable laws, regulations, permits, requirements, or orders. A “significant amount” means any detectable amount, except an amount that would meet the “no significant risk” level for chemicals that cause cancer or that is 1,000 times below the “no observable effect” level for chemicals that cause reproductive toxicity, if an individual were exposed to that amount in drinking water.

² See Section 25501(a)(4).

HOW IS PROPOSITION 65 ENFORCED?

Enforcement is carried out through civil lawsuits. These lawsuits may be brought by the Attorney General, any district attorney, or certain city attorneys. Lawsuits may also be brought by private parties acting in the public interest, but only after providing notice of the alleged violation to the Attorney General, the appropriate district attorney and city attorney, and the business accused of the violation. The notice must provide adequate information to allow the recipient to assess the nature of the alleged violation. The notice must comply with the information and procedural requirements specified in Section 25903 of Title 27 and sections 3100-3103 of Title 11. A private party may not pursue an independent enforcement action under Proposition 65 if one of the governmental officials noted above initiates an enforcement action within sixty days of the notice.

A business found to be in violation of Proposition 65 is subject to civil penalties of up to \$2,500 per day for each violation. In addition, the business may be ordered by a court to stop committing the violation.

A private party may not file an enforcement action based on certain exposures if the alleged violator meets specific conditions. For the following types of exposures, the Act provides an opportunity for the business to correct the alleged violation:

- An exposure to alcoholic beverages that are consumed on the alleged violator's premises to the extent onsite consumption is permitted by law;
- An exposure to a Proposition 65 listed chemical in a food or beverage prepared and sold on the alleged violator's premises that is primarily intended for immediate consumption on- or off-premises. This only applies if the chemical was not intentionally added to the food, and was formed by cooking or similar preparation of food or beverage components necessary to render the food or beverage palatable or to avoid microbiological contamination;
- An exposure to environmental tobacco smoke caused by entry of persons (other than employees) on premises owned or operated by the alleged violator where smoking is permitted at any location on the premises;
- An exposure to listed chemicals in engine exhaust, to the extent the exposure occurs inside a facility owned or operated by the alleged violator and primarily intended for parking non-commercial vehicles.

If a private party alleges that a violation occurred based on one of the exposures described above, the private party must first provide the alleged violator a notice of special compliance procedure and proof of compliance form.

A copy of the notice of special compliance procedure and proof of compliance form is included in Appendix B and can be downloaded from OEHHA's website at:
<http://oehha.ca.gov/prop65/law/p65law72003.html>.

FOR FURTHER INFORMATION ABOUT THE LAW OR REGULATIONS...

Contact the Office of Environmental Health Hazard Assessment's Proposition 65 Implementation Office at (916) 445-6900 or via e-mail at
P65Public.Comments@oehha.ca.gov.

Revised: May 2017

NOTE: Authority cited: Section 25249.12, Health and Safety Code. Reference: Sections 25249.5, 25249.6, 25249.7, 25249.9, 25249.10 and 25249.11, Health and Safety Code.

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Spectrum Chemical Notice of Violation

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ATTACHMENT B EXAMPLE SPECTRUM PRODUCTS SOLD WITHOUT WARNING

PRODUCT AND URL	LISTED CHEMICAL
1. Acetazolamide, USP, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Acetazolamide-USP_A1266.jsp	1. Acetazolamide
2. Acetazolamide, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Acetazolamide_TCI-A2598.jsp	2. Acetazolamide
3. Acetochlor, at https://www.spectrumchemical.com/OA_HTML/chemical-products_ACETOCHLOR-1000-ugmL_S-135-SC.jsp	3. Acetochlor
4. 2-Acetamidofluorene, at https://www.spectrumchemical.com/OA_HTML/chemical-products_2-Acetamidofluorene_A2820.jsp	4. 2-Acetylaminofluorene
5. 2-Acetamidofluorene, at https://www.spectrumchemical.com/OA_HTML/chemical-products_2-Acetamidofluorene_TCI-A0076.jsp	5. 2-Acetylaminofluorene
6. Altretamine, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Altretamine-USP_A3035.jsp	6. Altretamine
7. Aminoglutethimide, USP, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Aminoglutethimide-USP_A1139.jsp	7. Aminoglutethimide
8. Paromomycin Sulfate, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Paromomycin-Sulfate_P3639.jsp	8. Aminoglycosides
9. G418 Sulfate, at https://www.spectrumchemical.com/OA_HTML/chemical-products_G418-Sulfate_G3159.jsp	9. Aminoglycosides
10. Hygromycin B, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Hygromycin-B_H3399.jsp	10. Aminoglycosides
11. Atenolol, USP, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Atenolol-USP_A1648.jsp	11. Atenolol
12. 5-Azacytidine, at https://www.spectrumchemical.com/OA_HTML/chemical-products_5-Azacytidine_A3019.jsp	12. Azacitidine

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Attachment C

EXAMPLE THIRD-PARTY PRODUCTS SOLD WITHOUT WARNING

PRODUCT AND URL	LISTED CHEMICAL
1. 2-Acetamidofluorene, at https://www.spectrumchemical.com/OA_HTML/chemical-products_2-ACETAMIDOFLOURENE-1000-ugmL_S-130-SC.jsp	1. 2-Acetamidofluorene
2. ACRYLONITRILE, at https://www.spectrumchemical.com/OA_HTML/chemical-products_ACRYLONITRILE-1000-ugmL_S-180-SC.jsp	2. Acrylonitrile
3. Actinomycin D, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Actinomycin-D_40110004.jsp	3. Actinomycin D
4. ALACHLOR, at https://www.spectrumchemical.com/OA_HTML/chemical-products_ALACHLOR-1000-ugmL_S-185-SC.jsp	4. Alachlor
5. ALDRIN, at https://www.spectrumchemical.com/OA_HTML/chemical-products_ALDRIN-1000-ugmL_S-205.jsp	5. Aldrin
6. Retinoic Acid, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Retinoic-Acid_TCI-R0064.jsp	6. All-trans retinoic acid
7. 1-Adamantanamine Hydrochloride, at https://www.spectrumchemical.com/OA_HTML/chemical-products_1-Adamantanamine-Hydrochloride_TCI-A0588.jsp	7. Amantadine hydrochloride
8. Amikacin disulfate salt, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Amikacin-disulfate-salt_40110008.jsp	8. Amikacin sulfate
9. 2-Aminoanthraquinone, at https://www.spectrumchemical.com/OA_HTML/chemical-products_2-Aminoanthraquinone_TCI-A0255.jsp	9. 2-Aminoanthraquinone
10. 2-AMINOANTHRAQUINONE, at https://www.spectrumchemical.com/OA_HTML/chemical-products_2-AMINOANTHRAQUINONE-1000-PPM_S-220-SC.jsp	10. 2-Aminoanthraquinone
11. 4-Aminoazobenzene, at https://www.spectrumchemical.com/OA_HTML/chemical-products_4-Aminoazobenzene_TCI-P0141.jsp	11. <i>p</i> -Aminoazobenzene
12. 2-Aminoazotoluene, at https://www.spectrumchemical.com/OA_HTML/chemical-products_2-Aminoazotoluene_TCI-T0261.jsp	12. <i>o</i> -Aminoazotoluene
13. 4-Aminobiphenyl, at https://www.spectrumchemical.com/OA_HTML/chemical-products_4-Aminobiphenyl-1000-ugmL_S-225-SC.jsp	13. 4-Aminobiphenyl (4-amino-dephenyl)
14. 2-Aminofluorene, at https://www.spectrumchemical.com/OA_HTML/chemical-products_2-Aminofluorene_TCI-A0621.jsp	14. 2-Aminofluorene
15. DL-Aminoglutethimide, at https://www.spectrumchemical.com/OA_HTML/chemical-products_DL-Aminoglutethimide_TCI-A1947.jsp	15. Aminoglutethimide
16. Kanamycin Monosulfate, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Kanamycin-Monosulfate_TCI-K0047.jsp	16. Aminoglycosides
17. Tobramycin, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Tobramycin_TCI-T2503.jsp	17. Aminoglycosides
18. Fradiomycin Sulfate, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Fradiomycin-Sulfate_TCI-F0649.jsp	18. Aminoglycosides
19. Kanamycin Monosulfate, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Kanamycin-Monosulfate_TCI-K0047.jsp	19. Aminoglycosides
20. G418 Disulfate, at https://www.spectrumchemical.com/OA_HTML/chemical-products_G418-Disulfate_TCI-G0349.jsp	20. Aminoglycosides
21. Gentamicin Sulfate, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Gentamicin-Sulfate_TCI-G0383.jsp	21. Aminoglycosides
22. Gentamicin sulfate, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Gentamicin-sulfate_40710020.jsp	22. Aminoglycosides
23. Paromomycin sulfate, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Paromomycin-sulfate_41610009.jsp	23. Aminoglycosides
24. Kanamycin sulfate, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Kanamycin-sulfate_41110000.jsp	24. Aminoglycosides
25. Neomycin sulfate, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Neomycin-sulfate_41410004.jsp	25. Aminoglycosides

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Spectrum Chemical, Attachment C, pg. 2

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PRODUCT AND URL	LISTED CHEMICAL
26. Hygromycin B, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Hygromycin-B_40810000.jsp	26. Aminoglycosides
27. 1-Amino-2-methylantraquinone, at https://www.spectrumchemical.com/OA_HTML/chemical-products_1-Amino-2-methylantraquinone_TCI-A1255.jsp	27. 1-Amino-2-methylantraquinone
28. 4-Amino-2-nitrophenol, at https://www.spectrumchemical.com/OA_HTML/chemical-products_4-Amino-2-nitrophenol_TCI-A0379.jsp	28. 4-Amino-2-nitrophenol
29. Aminopterin Hydrate, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Aminopterin-Hydrate_TCI-A0410.jsp	29. Aminopterin
30. Amiodarone Hydrochloride, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Amiodarone-Hydrochloride_TCI-A2530.jsp	30. Amiodarone Hydrochloride
31. Amitraz, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Amitraz_TCI-A2608.jsp	31. Amitraz
32. AMITRAZ, at https://www.spectrumchemical.com/OA_HTML/chemical-products_AMITRAZ-1000-ugmL_S-246-SC.jsp	32. Amitraz
33. Amoxapine, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Amoxapine_TCI-A2499.jsp	33. Amoxapine
34. ANILINE, 1000 ug/mL, at https://www.spectrumchemical.com/OA_HTML/chemical-products_ANILINE-1000-ugmL_S-280-SC.jsp	34. Aniline
35. o-Anisidine Hydrochloride, at https://www.spectrumchemical.com/OA_HTML/chemical-products_o-Anisidine-Hydrochloride_TCI-A0489.jsp	35. o-Anisidine Hydrochloride
36. ANTHRAQUINONE 1000 PPM, at https://www.spectrumchemical.com/OA_HTML/chemical-products_ANTHRAQUINONE-1000-PPM_S-295-SC.jsp	36. Anthraquinone
37. Acetylsalicylic Acid, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Acetylsalicylic-Acid_TCI-A2262.jsp	37. Aspirin
38. Atenolol, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Atenolol_TCI-A1414.jsp	38. Atenolol
39. ATRAZINE, at https://www.spectrumchemical.com/OA_HTML/chemical-products_ATRAZINE-1000-ugmL_S-365-SC.jsp	39. Atrazine
40. 5-Azacytidine, at https://www.spectrumchemical.com/OA_HTML/chemical-products_5-Azacytidine_TCI-A2033.jsp	40. Azacytidine
41. AZOBENZENE, 1000 ug/mL, at https://www.spectrumchemical.com/OA_HTML/chemical-products_AZOBENZENE-1000-ugmL_S-370-SC.jsp	41. Azobenzene

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ATTACHMENT D EXAMPLE PRODUCTS WITH NON-COMPLIANT WARNINGS

PRODUCT AND URL	LISTED CHEMICAL
1. Abiraterone Acetate, 98 %, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Abiraterone-Acetate_TCI-A2891.jsp	1. Abiraterone Acetate
2. Acetamide, 98 %, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Acetamide_TCI-A0007.jsp	2. Acetamide
3. Acetohydroxamic Acid, approx. 98 %, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Acetohydroxamic-Acid_A2270.jsp	3. Acetohydroxamic acid
4. Acetohydroxamic Acid, 98 %, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Acetohydroxamic-Acid_TCI-A0051.jsp	4. Acetohydroxamic acid
5. Acrylonitrile, stabilized with MEHQ, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Acrylonitrile-stabilized-with-MEHQ_TCI-A0146.jsp	5. Acrylonitrile
6. Actinomycin D, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Actinomycin-D_A1018.jsp	6. Actinomycin D
7. Streptomycin Sulfate, USP, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Streptomycin-Sulfate-USP_ST135.jsp	7. Aminoglycosides
8. Streptomycin Sulfate, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Streptomycin-Sulfate_TCI-S0585.jsp	8. Aminoglycosides
9. Streptomycin Sulfate, [for Protein Research], at https://www.spectrumchemical.com/OA_HTML/chemical-products_Streptomycin-Sulfate-for-Protein-Research_TCI-S0834.jsp	9. Aminoglycosides
10. Amiodarone Hydrochloride, EP, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Amiodarone-Hydrochloride-EP_A1189.jsp	10. Amiodarone Hydrochloride
11. 3-Amino-1,2,4-triazole, at https://www.spectrumchemical.com/OA_HTML/chemical-products_3-Amino-124-triazole_TCI-A0432.jsp	11. Amitrole
12. Amoxapine, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Amoxapine_A2102.jsp	12. Amoxapine
13. Aniline, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Aniline_TCI-A0463.jsp	13. Aniline
14. o-Anisidine, at https://www.spectrumchemical.com/OA_HTML/chemical-products_o-Anisidine_TCI-A0486.jsp	14. o-Anisidine
15. Anthraquinone, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Anthraquinone_TCI-A0502.jsp	15. Anthraquinone
16. Arsenic Trichloride, Reagent, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Arsenic-Trichloride-Reagent_A1341.jsp	16. Arsenic (inorganic arsenic compounds)
17. Arsenic Pentoxide, Reagent, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Arsenic-Pentoxide-Reagent_A1339.jsp	17. Arsenic (inorganic oxides)
18. Atrazine, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Atrazine_TCI-A1650.jsp	18. Atrazine
19. Auranofin, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Auranofin_A3488.jsp	19. Auranofin
20. Azathioprine, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Azathioprine_TCI-A2069.jsp	20. Azathioprine
21. Azobenzene, at https://www.spectrumchemical.com/OA_HTML/chemical-products_Azobenzene_TCI-A0565.jsp?minisite=10020&respid=22372&phrase=103-33-3	21. Azobenzene

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Spectrum Chemical Notice of Violation

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Attachment E: Listed Chemicals

A-alpha-C (2-Amino-9H-pyrido[2,3-b]indole)	Benz[a]anthracene	Chlordiazepoxide
Abiraterone acetate	Benzene	Chlordiazepoxide hydrochloride
Acetaldehyde	Benzidine [and its salts]	Chlordimeform
Acetamide	Benzidine-based dyes	Chlorendic acid
Acetazolamide	Benzodiazepines	Chlorinated paraffins (Average chain length, C12; approximately 60 percent chlorine by weight)
Acetochlor	Benzo[b]fluoranthene	P-Chloroaniline-Chloroaniline
Acetohydroxamic acid	Benzo[k]fluoranthene	p-Chloroaniline hydrochloride-p-Chloroaniline hydrochloride
2-Acetylaminofluorene	Benzo[k]fluoranthene	Chloroethane (Ethyl chloride)
Acifluorfen sodium	Benzofuran	1-(2-Chloroethyl)-3-cyclohexyl-1-nitrosourea (CCNU) (Lomustine)
Acrylamide	Benzophenone	1-(2-Chloroethyl)-3-(4-methylcyclohexyl)-1-nitrosourea (Methyl-CCNU)
Acrylonitrile	Benzo[a]pyrene	Chloroform
Actinomycin D	Benzotrichloride	Chloromethyl methyl ether (technical grade)
AF-2;[2-(2-furyl)-3-(5-nitro-2-furyl)]acrylamide	Benzphetamine hydrochloride	3-Chloro-2-methylpropene
Aflatoxins	Benzyl chloride	1-Chloro-4-nitrobenzene
Alachlor	Benzyl violet 4B	4-Chloro-o-phenylenediamine
Alcoholic beverages	Beryllium and beryllium compounds	Chloroprene
Alcoholic beverages, when associated with alcohol abuse	Betel quid with tobacco	2-Chloropropionic acid
Aldrin	Betel quid without tobacco	Chlorothalonil
All-trans retinoic acid	Bevacizumab	P-Chloro-o-toluidine
Aloe Vera, non-decolorized whole leaf extract	2,2-Bis(bromomethyl)-1,3-propanediol	p-Chloro-o-toluidine, strong acid salts of p-Chloro-o-toluidine
Alprazolam	Bis(2-chloroethyl)ether	5-Chloro-o-toluidine and its strong acid salts
Altretamine	N,N-Bis(2-chloroethyl)-2-naphthylamine (Chlornapazine)	Chlorotrianisene
Amantadine hydrochloride	Bis(chloroethyl nitrosourea (BCNU) (Carmustine)	p-chloro- α,α,α -trifluorotoluene (para-Chlorobenzotrifluoride, PCBTF)
Amikacin sulfate	Bis(2-chloro-1-methylethyl)ether, technical grade	Chlorozotocin
2-Aminoanthraquinone	Bisphenol A (BPA)	Chlorpyrifos
P-Aminoazobenzene	Bitumens, extracts of steam-refined and air refined	Chromium (hexavalent compounds)
O-Aminoazotoluene	Bracken fern	Chrysene
4-Aminobiphenyl (4-aminodiphenyl)	Bromacil lithium salt	C.I. Acid Red 114
1-Amino-2,4-dibromoanthraquinone	Bromate	C.I. Basic Red 9 monohydrochloride
3-Amino-9-ethylcarbazole hydrochloride	Bromochloroacetic acid	C.I. Direct Blue 15
2-Aminofluorene	Bromodichloroacetic acid	C.I. Direct Blue 218
Aminoglutethimide	Bromodichloromethane	C.I. Disperse Yellow 3
Aminoglycosides	Bromoethane	C.I. Solvent Yellow 14
1-Amino-2-methylantraquinone	Bromoform	Ciclosporin (Cyclosporin A; Cyclosporine)
2-Amino-5-(5-nitro-2-furyl)-1,3,4-thiadiazole	1-Bromopropane (1-BP)	Cidofovir
4-Amino-2-nitrophenol	2-Bromopropane (2-BP)	Cinnamyl anthranilate
Aminopterin	Bromoxynil	Cisplatin
Amiodarone hydrochloride	Bromoxynil octanoate	Citrus Red No. 2
Amitraz	Butabarbital sodium	Cladribine
Amitrole	1,3-Butadiene	Clarithromycin
Amoxapine	1,4-Butanediol dimethanesulfonate (Busulfan)	Clobetasol propionate
Amsacrine	Butylated hydroxyanisole	Clofibrate
Anabolic steroids	Butyl benzyl phthalate (BBP)d	Clomiphene citrate
Analgesic mixtures containing Phenacetin	beta-Butyrolactone	Clorazepate dipotassium
Androstenedione	Cacodylic acid	CMNP (pyrazachlor)
Angiotensin converting enzyme (ACE) inhibitors	Cadmium	Cobalt metal powder
Aniline	Cadmium and cadmium compounds	Cobalt [II] oxide
Aniline hydrochloride	Caffeic acid	Cobalt sulfate
o-Anisidine-o-Anisidine	Captadol	Cobalt sulfate heptahydrate
o-Anisidine hydrochloride	Captan	Cocaine
Anisindione	Carbamazepine	Coconut oil diethanolamine condensate (cocamide diethanolamine)
Antraquinone	Carbaryl	Codeine phosphate
Antimony oxide (Antimony trioxide)	Carbazole	Coke oven emissions
Aramite	Carbon black (airborne, unbound particles of respirable size)	Colchicine
Areca nut	Carbon-black extracts	Conjugated estrogens
Aristolochic acids	Carbon disulfide	Creosotes
Arsenic (inorganic arsenic compounds)	Carbon monoxide	p-Cresidine
Arsenic (inorganic oxides)	Carbon tetrachloride	Cumene
Asbestos	Carboplatin	Cupferron
Aspirin	N-Carboxymethyl-N-nitrosourea	Cyanazine
Atenolol	Catechol	Cycasin
Atrazine	Ceramic fibers (airborne particles of respirable size)	Cycloate
Auramine	Certain combined chemotherapy for lymphomas	Cycloheximide
Auranofin	Chenodiol	Cyclopenta[cd]pyrene
Avermectin B1 (Abamectin)	Chloral	Cyclophosphamide (anhydrous)
Azacitidine	Chloral hydrate	Cyclophosphamide (hydrated)
Azaserine	Chlorambucil	Cyhexatin
Azathioprine	Chloramphenicol sodium succinate	
Azobenzene	Chlorcyclizine hydrochloride	
Barbiturates	Chlordane	
Beclomethasone dipropionate	Chlordecone (Kepone)	
Benomyl		
Benthiavalicarb-isopropyl		

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Cytarabine	Diltiazem hydrochloride	Ethylbenzene
Cytembena	3,3'-Dimethoxybenzidine (o-Dianisidine)	Ethyl dipropylthiocarbamate
D&C Orange No. 17	3,3'-Dimethoxybenzidine dihydrochloride	Ethyl-4,4'-dichlorobenzilate
D&C Red No. 8	3,3'-Dimethoxybenzidine-based dyes metabolized to	Ethylene dibromide
D&C Red No. 9	3,3'-dimethoxybenzidine	Ethylene dichloride (1,2-Dichloroethane)
D&C Red No. 19	4-Dimethylaminoazobenzene	Ethylene glycol (ingested)
Dacarbazine	trans-2-[(Dimethylamino)methylimino]-5-[2-(5-nitro-2-furyl)vinyl]-1,3,4-oxadiazole	Ethylene glycol monoethyl ether
Daminozide	7,12-Dimethylbenz(a)anthracene	Ethylene glycol monoethyl ether acetate
Danazol	3,3'-Dimethylbenzidine (ortho-Tolidine)	Ethyleneimine (Aziridine)
Dantron (Chrysazin; 1,8-Dihydroxyanthraquinone)	3,3'-Dimethylbenzidine-based dyes metabolized to	Ethylene oxide
Daunomycin	3,3'-dimethylbenzidine	Ethylene thiourea
Daunorubicin hydrochloride	3,3'-Dimethylbenzidine dihydrochloride	Ethyl methanesulfonate
DDD (Dichlorodiphenyl-dichloroethane)	Dimethylcarbonyl chloride	Etodolac
DDE (Dichlorodiphenyl-dichloroethylene)	N,N-Dimethylformamide	Etoposide
DDT (Dichlorodiphenyl-trichloroethane)	1,1-Dimethylhydrazine (UDMH)	Etoposide in combination with cisplatin and
o,p'-DDT	1,2-Dimethylhydrazine	bleomycin
p,p'-DDT	2,6-Dimethyl-N-nitrosomorpholine (DMNM)	Etretinate
DDVP (Dichlorvos)	Dimethyl sulfate	Fenoxaprop ethyl
Demeclocycline hydrochloride (internal use)	N,N-Dimethyl-p-toluidineN	Fenoxycarb
Des-ethyl atrazine (DEA)	Dimethylvinylchloride	Filgrastim
Des-isopropyl atrazine (DIA)	Di-n-butyl phthalate (DBP)	Fluazifop butyl
N,N'-Diacetylbenzidine	Di-n-hexyl phthalate (DnHP)	Flunisolide
2,4-Diaminoanisole	M-Dinitrobenzenem	Fluorouracil
2,4-Diaminoanisole sulfate	O-Dinitrobenzeneo-Dinitrobenzene	Fluoxymesterone
2,4-Diamino-6-chloro-s-triazine (DACT)	P-Dinitrobenzenep-Dinitrobenzene	Flurazepam hydrochloride
4,4'-Diaminodiphenyl ether (4,4'-Oxydianiline)	3,7-Dinitrofluoranthene	Flurbiprofen
2,4-Diaminotoluene	3,9-Dinitrofluoranthene	Flutamide
Diazepam	1,3-Dinitropyrene	Fluticasone propionate
Diazoaminobenzene	1,6-Dinitropyrene	Fluvalinate
Diazoxide	1,8-Dinitropyrene	Folpet
Dibenz[a,h]acridine	2,4-Dinitrotoluene	Formaldehyde (gas)
Dibenz[a,j]acridine	2,6-Dinitrotoluene	2-(2-Formylhydrazino)-4-(5-nitro-2-furyl)thiazole
Dibenzanthracenes	Dinitrotoluene (technical grade)	Fumonisin B (1FumonisinB1)
Dibenz[a,c]anthracene	Dinitrotoluene mixture, 2,4-/2,6-	Furan
Dibenz[a,h]anthracene	Dinocap	Furazolidone
Dibenz[a,j]anthracene	Dinoseb	Furfuryl alcohol
7H-Dibenzo[c,g]carbazole	Di-n-propyl isocinchomerone (MGK Repellent	Furmecyclo
Dibenzo[a,e]pyrene	326)Di-n-propyl isocinchomerone (MGK Repellent	Fusarin C
Dibenzo[a,h]pyrene	326)Di-n-propyl isocinchomerone (MGK Repellent	Gallium arsenide
Dibenzo[a,i]pyrene	326)	Ganciclovir
Dibromoacetic acid	1,4-Dioxane	Ganciclovir sodium
Dibromoacetonitrile	Diphenylhydantoin (Phenytoin)	Gasoline engine exhaust (condensates/extracts)
1,2-Dibromo-3-chloropropane (DBCP)	Diphenylhydantoin (Phenytoin), sodium salt	Gemfibrozil
2,3-Dibromo-1-propanol	Direct Black 38 (technical grade)	Gentian violet (Crystal violet)
Dichloroacetic acid	Direct Blue 6 (technical grade)	Glass wool fibers (inhalable and biopersistent)
P-Dichlorobenzenep-Dichlorobenzene	Direct Brown 95 (technical grade)	Glu-P-1 (2-Amino-6-methyldipyrro[1,2- a:3',2'-
3,3'-Dichlorobenzidine	Disodium cyanodithioimidocarbonate	d]imidazole)
3,3'-Dichlorobenzidine dihydrochloride	Disperse Blue 1	Glu-P-2 (2-Aminodipyrro[1,2-a:3',2'-d]imidazole)
1,1-Dichloro-2,2-bis(p-chlorophenyl)ethylene (DDE)	Diuron	Glycidaldehyde
1,4-Dichloro-2-butene	Doxorubicin hydrochloride (Adriamycin)	Glycidol
3,3'-Dichloro-4,4'-diamino-diphenyl ether	Doxycycline (internal use)	Glyphosate
1,1-Dichloroethane	Doxycycline calcium (internal use)	Goldenseal root powder
Dichloromethane (Methylene chloride)	Doxycycline hyclate (internal use)	Goserelin acetate
Dichlorophene	Doxycycline monohydrate (internal use)	Griseofulvin
Dichlorophenamide	Emissions from combustion of coal	Gyromitrin (Acetaldehyde methylformylhydrazone)
1,2-Dichloropropane	Emissions from high-temperature unrefined	Halazepam
1,3-Dichloro-2-propanol (1,3-DCP)	rapeseed oil	Halobetasol propionate
1,3-Dichloropropene	Endrin	Haloperidol
Diclofop-methyl	Environmental tobacco smoke (ETS)	Halothane
Diclofop methyl	Epichlorohydrin	HC Blue 1
Dicumarol	Epoxiconazole	Heptachlor
Dieldrin	Ergotamine tartrate	Heptachlor epoxide
Diepoxybutane	Erionite	Herbal remedies containing plant species of the
Diesel engine exhaust	Estradiol 17B	genus Aristolochia
Diethanolamine	Estragole	Hexachlorobenzene
Di(2-ethylhexyl)phthalate (DEHP)	Estrogens, steroidal	Hexachlorobutadiene
1,2-Diethylhydrazine	Estrogen-progestogen (combined) used as	Hexachlorocyclohexane (technical grade)
Diethylstilbestrol (DES)	menopausal therapy	Hexachlorocyclohexane (alpha isomer)
Diethyl sulfate	Estrone	Hexachlorocyclohexane (beta isomer)
Diflunisal	Estropipate	Hexachlorocyclohexane (gamma isomer)
Diglycidyl resorcinol ether (DGRE)	Ethinylestradiol	Hexachlorodibenzodioxin
Dihydroergotamine mesylate	Ethionamide	Hexachloroethane
Dihydrosafole	Ethoprop	2,4-Hexadienal (89% trans, trans isomer; 11% cis,
Di-isodecyl phthalate (DIDP)	Ethyl acrylate	trans isomer)
Diisononyl phthalate (DINP)	Ethyl alcohol in alcoholic beverages	Hexafluoroacetone
Diisopropyl sulfate		Hexamethylphosphoramide

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N-Hexane	8-Methoxypsoralen with ultraviolet A therapy	Nickel oxide
2,5-Hexanedione	2-Methylaziridine (Propyleneimine)	Nickel refinery dust from the pyrometallurgical process
Histrelin acetate	Methylazoxymethanol	Nickel subsulfide
Hydramethylnon	Methylazoxymethanol acetate	Nicotine
Hydrazine	Methyl bromide, as a structural fumigant	Nifedipine
Hydrazine sulfate	Methyl carbamate	Nimodipine
Hydrazobenzene (1,2-Diphenylhydrazine)	Methyl chloride	Niridazole
Hydrogen cyanide (HCN) and cyanide salts (CN salts)	3-Methylcholanthrene	Nitrapyrin
1-Hydroxyanthraquinone	5-Methylchrysene	Nitrilotriacetic acid
Hydroxyurea	4,4'-Methylene bis(2-chloroaniline)	Nitrilotriacetic acid, trisodium salt monohydrate
Idarubicin hydrochloride	4,4'-Methylene bis(N,N-dimethyl)benzenamine	5-Nitroacenaphthene
Ifosfamide	4,4'-Methylene bis(2-methylaniline)	o-Nitroanisoleo-Nitroanisoleo-Nitroanisoleo-Nitroanisoleo-Nitroanisole
Iodine-131	4,4'-Methylenedianiline	Nitrobenzene
Imazalil	4,4'-Methylenedianiline dihydrochloride	4-Nitrobiphenyl
Indeno[1,2,3-cd]pyrene	Methyleugenol	6-Nitrochrysene
Indium phosphide	Methylhydrazine and its salts	Nitrofen (technical grade)
IQ (2-Amino-3-methylimidazo[4,5-f] quinoline)	Methylhydrazine	2-Nitrofluorene
Iprodione	Methylhydrazine sulfate	Nitrofurantoin
lprovalicarb	2-Methylimidazole	Nitrofurazone
Iron dextran complex	4-Methylimidazole	1-[(5-Nitrofurfurylidene)-amino]-2-imidazolidinone
Isobutyl nitrite	Methyl iodide	N-[4-(5-Nitro-2-furyl)-2-thiazolyl]acetamide
Isoprene	Methyl isobutyl ketone	Nitrogen mustard (Mechlorethamine)
Isoprazam	Methyl isobutyl ketone (MIBK)	Nitrogen mustard hydrochloride (Mechlorethamine hydrochloride)
Isotretinoin	Methyl isocyanate (MIC)	Nitrogen mustard N-oxide
Isoxaflutole	Methyl mercury	Nitrogen mustard N-oxide hydrochloride
Kresoxim-methyl	Methylmercury compounds	Nitromethane
Lactofen	Methyl methanesulfonate	2-Nitropropane
Lasiocarpine	Methyl-n-butyl ketone	1-Nitropyrene
Lead	2-Methyl-1-nitroanthraquinone (of uncertain purity)	4-Nitropyrene
Lead and lead compounds	N-Methyl-N'-nitro-N-nitrosoguanidine	N-Nitrosodi-n-butylamineN-Nitrosodi-n-butylamineN-Nitrosodi-n-butylamine
Lead acetate	N-Methylolacrylamide	N-Nitrosodiethanolamine
Lead phosphate	N-Methylpyrrolidone	N-Nitrosodiethylamine
Lead subacetate	α-Methyl styrene (alpha-Methylstyrene)	N-Nitrosodimethylamine
Leather dust	Methyltestosterone	p-Nitrosodiphenylaminep-Nitrosodiphenylaminep-Nitrosodiphenylamine
Leuprolide acetate	Methylthiouracil	N-Nitrosodiphenylamine
Levodopa	Metiram	N-Nitrosodiphenylamine
Levonorgestrel implants	Metronidazole	N-Nitrosodi-n-propylamineN-Nitrosodi-n-propylamine
Lindane and other hexachlorocyclohexane isomers	Michler's ketone	N-Nitroso-N-ethylurea
Linuron	Midazolam hydrochloride	N-Nitrosohexamethyleneimine
Lithium carbonate	Minocycline hydrochloride (internal use)	3-(N-Nitrosomethylamino) propionitrile
Lithium citrate	Mirex	4-(N-Nitrosomethylamino)-1-(3-pyridyl)-1-butanone
Lorazepam	Misoprostol	N-Nitrosomethyl-n-butylamine
Lovastatin	Mitomycin C	N-Nitrosomethyl-n-decylamine
Lynestrenol	Mitoxantrone hydrochloride	N-Nitrosomethyl-n-dodecylamine
Malathion	Molinate	N-Nitrosomethylethylamine
Malonaldehyde, sodium salt	MON 4660 (dichloroacetyl-1-oxa-4-azaspiro(4,5)-decane	N-Nitrosomethyl-n-heptylamine
Mancozeb	MON 13900 (furalazole)	N-Nitrosomethyl-n-hexylamine
Maneb	3-Monochloropropane-1,2-diol (3-MCPD)	N-Nitrosomethyl-n-nonylamine
Marijuana smoke	Monocrotaline	N-Nitrosomethyl-n-octylamine
Me-A-alpha-C (2-Amino-3-methyl-9H-pyrido[2,3-b]indole)	MOPP (vincristine-prednisone-nitrogen mustard-procarbazine mixture)	N-Nitrosomethyl-n-pentylamine
Mebendazole	5-(Morpholinomethyl)-3-[(5-nitrofurfuryl-idene)-amino]-2-oxazolidinone	N-Nitrosomethyl-n-propylamine
Medroxyprogesterone acetate	Mustard Gas	N-Nitrosomethyl-n-tetradecylamine
Megestrol acetate	MX (3-chloro-4-dichloromethyl-5-hydroxy-2(5H)-furanone)	N-Nitrosomethyl-n-undecylamine
MeIQ (2-Amino-3,4-dimethylimidazo[4,5-f]quinoline)	Myclobutanil	N-Nitroso-N-methylurea
MeIQx (2-Amino-3,8-dimethylimidazo[4,5-f]quinoxaline)	beta-Myrcene	N-Nitroso-N-methylurethane
Melphalan	Nabam	N-Nitrosomethylvinylamine
Menotropins	Nafarelin acetate	N-Nitrosomorpholine
Mepaniprim	Nafenopin	N-Nitrososarcosine
Meprobamate	Nalidixic acid	o-Nitrotoluene
2-Mercaptobenzothiazole	Naphthalene	Nitrous oxide
Mercaptopurine	1-Naphthylamine	Norethisterone (Norethindrone)
Mercury and mercury compounds	2-Naphthylamine	Norethisterone acetate (Norethindrone acetate)
Merphalan	Neomycin sulfate (internal use)	Norethisterone (Norethindrone) /Ethinyl estradiol
Mestranol	Netilmicin sulfate	Norethisterone (Norethindrone) /Mestranol
Metam potassium	Nickel (Metallic)	Norethynodrel
Methacycline hydrochloride	Nickel acetate	Norgestrel
Metham sodium	Nickel carbonate	Ochratoxin A
Methanol	Nickel carbonyl	Oil Orange SS
Methazole	Nickel compounds	
Methimazole	Nickel (soluble compounds)	
Methotrexate	Nickel hydroxide	
Methotrexate sodium	Nickel iodide	
5-Methoxypsoralen with ultraviolet A therapy	Nickelocene	

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Oral contraceptives, combined	Propazine	Thioacetamide
Oral contraceptives, sequential	beta-Propiolactone	4,4'-Thiodianiline
Oryzalin	Propoxur	Thiodicarb
Oxadiazon	Propylene glycol mono-t-butyl ether	Thioguanine
Oxazepam	Propylene oxide	Thiophanate methyl
Oxydemeton methyl	Propylthiouracil	Thiouracil
Oxymetholone	Pulegone	Thiourea
Oxymetholone	Pymetrozine	Thorium dioxide
Oxytetracycline (internal use)	Pyridine	Titanium dioxide (airborne, unbound particles of respirable size)
Oxytetracycline hydrochloride (internal use)	Pyrimethamine	Tobacco, oral use of smokeless products
Oxythioquinox (Chinomethionat)	Quazepam	Tobacco smoke
Paclitaxel	Quinoline and its strong acid salts	Tobacco smoke (primary)
Palygorskite fibers (> 5µm in length)	Quizalofop-ethyl	Tobramycin sulfate
Panfuran S	Radionuclides	Toluene
Paramethadione	Reserpine	Toluene diisocyanate
Parathion	Residual (heavy) fuel oils	o-Toluidineo-Toluidineo-Toluidine
Penicillamine	Resmethrin	o-Toluidine hydrochlorideo-Toluidine hydrochlorideo-Toluidine hydrochloride
pentabromodiphenyl ether mixture [DE-71 (technical grade)]	Retinol/retinyl esters, when in daily dosages in excess of 10,000 IU, or 3,000 retinol equivalents.	Topiramate
Pentachlorophenol	Ribavirin	Toxaphene (Polychlorinated camphenes)
Pentachlorophenol and by-products of its synthesis (complex mixture)	Riddelline	Toxins derived from Fusarium moniliforme (Fusarium verticillioides)
Pentobarbital sodium	Rifampin	Treosulfan
Pentosan polysulfate sodium	Safrole	Triadimefon
Pentostatin	Salted fish, Chinese-style	Triamterene
Perfluorooctane sulfonate (PFOS)	Secobarbital sodium	Triazolam
Perfluorooctanoic acid (PFOA)	Sedaxane	S, S, S-Tributyl phosphorotrithioate (Tribufos, DEF)
Pertuzumab	Selenium sulfide	Tributyltin methacrylate
Phenacemide	Sermorelin acetate	Trichlormethine (Trimustine hydrochloride)
Phenacetin	Shale-oils	Trichloroacetic acid
Phenazopyridine	Silica, crystalline (airborne particles of respirable size)	Trichloroethylene
Phenazopyridine hydrochloride	Simazine	2,4,6-Trichlorophenol
Phenesterin	Sodium dimethyldithiocarbamate	1,2,3-Trichloropropane
Phenobarbital	Sodium fluoroacetate	Trientine hydrochloride
Phenolphthalein	Soots, tars, and mineral oils (untreated and mildly treated oils and used engine oils)	Triforine
Phenoxybenzamine	Spirodiclofen	Trilostane
Phenoxybenzamine hydrochloride	Spironolactone	Trimethadione
Phenprocoumon	Stanozolol	2,4,5-Trimethylaniline and its strong acid salts
o-Phenylenediamine and its salts	Sterigmatocystin	Trimethyl phosphate
Phenyl glycidyl ether	Streptomycin sulfate	Trimetrexate glucuronate
Phenylhydrazine and its salts	Streptozocin (streptozotocin)	TRIM® VX
o-Phenylphenate, sodiumo-Phenylphenate, sodiumo-Phenylphenate, sodium	Streptozotocin (streptozocin)	2,4,6-Trinitrotoluene (TNT)
o-Phenylphenolo-Phenylphenolo-Phenylphenol	Strong inorganic acid mists containing sulfuric acid	Triphenyltin hydroxide
Phenylphosphine	Styrene	Tris(1-aziridinyl)phosphine sulfide (Thiotepa)
PhiP(2-Amino-1-methyl-6-phenylimidazol[4,5-b]pyridine)	Styrene oxide	Tris(2-chloroethyl) phosphate
Pimozide	Sulfallate	Tris(2,3-dibromopropyl)phosphate
Pioglitazone	Sulfasalazine (Salicylazosulfapyridine)	Tris(1,3-dichloro-2-propyl) phosphate (TDCPP)
Pipobroman	Sulfur dioxide	Trp-P-1 (Tryptophan-P-1)
Pirimicarb	Sulindac	Trypan blue (commercial grade)
Plicamycin	Talc containing asbestiform fibers	Unleaded gasoline (wholly vaporized)
Polybrominated biphenyls	Tamoxifen and its salts	Uracil mustard
Polychlorinated biphenyls	Tamoxifen citrate	Urethane (Ethyl carbamate)
Polychlorinated biphenyls (containing 60 or more percent chlorine by molecular weight)	Temazepam	Urofollitropin
Polychlorinated dibenzo-p-dioxinsPolychlorinated dibenzo-p-dioxins	Teniposide	Valproate (Valproic acid)
Polychlorinated dibenzofurans	Terbacil	Vanadium pentoxide (orthorhombic crystalline form)
Polygeenan	Teriparatide	Vinblastine sulfate
Ponceau MX	Terrazole	Vinclozolin
Ponceau 3R	Testosterone and its esters	Vincristine sulfate
Potassium bromate	Testosterone cypionate	Vinyl bromide
Potassium dimethyldithiocarbamate	Testosterone enanthate	Vinyl chloride
Pravastatin sodium	Tetrabromobisphenol A	4-Vinylcyclohexene
Prednisolone sodium phosphate	3,3',4,4'-Tetrachloroazobenzene	4-Vinyl-1-cyclohexene diepoxide (Vinyl cyclohexenedioxide)
Primidone	2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)	Vinyl fluoride
Procarbazine	1,1,2,2-Tetrachloroethane	Vinylidene chloride
Procarbazine hydrochloride	Tetrachloroethylene (Perchloroethylene)	(1,1-Dichloroethylene)
Procymidone	p-a,a,a-Tetrachlorotoluenep-a,a,a-	Vinyl trichloride (1,1,2-Trichloroethane)
Progesterone	Tetrachlorotoluenep-a,a,a-Tetrachlorotoluenep-a,a,a-Tetrachlorotoluene	Vismodegib
Pronamide	Tetrachlorvinphos	Warfarin
Propachlor	Tetracycline (internal use)	Wood dust
1,3-Propane sultone	Tetracyclines (internal use)	2,6-Xylidine (2,6-Dimethylaniline)
Propargite	Tetracycline hydrochloride (internal use)	Zalcitabine
Propargite	Tetrafluoroethylene	Zidovudine (AZT)
	Tetranitromethane	Zileuton
	Thalidomide	

August 9, 2019

CERTIFICATE OF MERIT (SPECTRUM CHEMICAL MFG. CORP.)
(Health and Safety Code Section 25249.7(d))

I, Benjamin D. Weston, hereby declare:

1. This Certificate of Merit accompanies the attached 60-day notice in which it is alleged the parties identified in the notices have violated California Health and Safety Code section 25249.6 by failing to provide clear and reasonable warnings.
2. I am the attorney for the noticing party.
3. I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the alleged exposures to the listed chemicals that are the subject of the action.
4. Based on the information obtained through those consultations, and on all other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for the private action" means that the information provides a credible basis that all elements of the plaintiff's case can be established and the information did not prove that the alleged violator will be able to establish any of the affirmative defenses set forth in the statute.
5. The copy of this Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including the information identified in Health and Safety Code section 25249.7(h)(2), *i.e.*, (1) the identity of the persons consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Dated: August 9, 2019



Benjamin D. Weston

Certificate of Service

I, Chris Johnson, hereby declare:

1. I am, and was at the time of service hereinafter mentioned, a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is 498 Calle Principal, Monterey, California 93940.

2. On August 9, 2019, I served the following documents:

- 60-Day Notice of Violation (with Attachments A, B, C, D and E)
- Certificate of Merit

on the following party by the method described below:

Spectrum Chemical Mfg. Corp.
Attn: Chief Executive Officer
769 Jersey Avenue
New Brunswick, New Jersey 08901

3. On August 9, 2019, I served the following documents:

- 60-Day Notice of Violation (with Attachments B, C, D and E)
- Certificate of Merit

on each of the parties on the service list attached hereto by the method described below.

BY MAIL: I deposited such envelope in the mail at Monterey, California, with postage thereon fully prepaid. I am readily familiar with my company's practice of preparing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that service is presumed invalid if the postal cancellation date or postage meter date is more than one (1) day after date of my signature below.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: August 9, 2019

Chris Johnson

I, Benjamin D. Weston, hereby declare:

1. I am, and was at the time of service hereinafter mentioned, a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is 1968 South Coast Highway, Suite 1200, Laguna Beach, CA 92651.

2. On August 9, 2019, I served the following documents:

- 60-Day Notice of Violation
- Certificate of Merit

on the following persons by causing a true and correct .PDF copy thereof to be sent via electronic mail to the parties listed below, pursuant to Cal. Code Regs., title. 27, § 25903(c)(1):

Alameda County District Attorney CEPDProp65@acgov.org	Calaveras County District Attorney Prop65Env@co.calaveras.ca.us
Contra Costa County District Attorney sgrassini@contracostada.org	Inyo County District Attorney inyoda@inyocounty.us
Lassen County District Attorney mlatimer@co.lassen.ca.us	Monterey County District Attorney Prop65DA@co.monterey.ca.us
Napa County District Attorney CEPD@countyofnapa.org	Riverside County District Attorney Prop65@rivcoda.org
Sacramento County District Attorney Prop65@sacda.org	San Diego City Attorney CityAttyProp65@sandiego.gov
San Diego County District Attorney CityAttyCrimProp65@sandiego.gov	San Francisco County District Attorney gregory.alker@sfgov.org
San Francisco City Attorney Valerie.Lopez@sfcityattys.org	San Joaquin County District Attorney DA DAConsumer.Environmental@sjcda.org
San Luis Obispo County District Attorney edobroth@co.slo.ca.us	Santa Barbara County District Attorney DAProp65@co.santa-barbara.ca.us
Santa Clara County District Attorney EPU@da.sccgov.org	Santa Cruz County District Attorney Prop65DA@santacruzcounty.us
Sonoma County District Attorney jbarnes@sonoma-county.org	Tulare County District Attorney Prop65@co.tulare.ca.us
Ventura County District Attorney daspecialops@ventura.org	Yolo County District Attorney cfepd@yolocounty.org

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: August 9, 2019

Benjamin D. Weston

List for Service by Mail

Alpine County District Attorney
P.O. Box 248
Markleeville, CA 96120

Amador County District Attorney
708 Court Street #202
Jackson, CA 95642

Butte County District Attorney
25 County Center Drive, Suite 245
Oroville, CA 95965

Colusa County District Attorney
346 Fifth Street, Suite 101
Colusa, CA 95932

Del Norte County District Attorney
450 H Street, Room 171
Crescent City, CA 95531

El Dorado County District Attorney
778 Pacific Street
Placerville, CA 95667, USA

Fresno County District Attorney
2220 Tulare Street, Suite 1000
Fresno, CA 93721

Glenn County District Attorney
P.O. Box 430
Willows, CA 95988

Humboldt County District Attorney
825 5th Street, 4th Floor
Eureka, CA 95501

Imperial County District Attorney
940 West Main Street, Suite 102
El Centro, CA 92243

Kern County District Attorney
1215 Truxtun Avenue, 4th Floor
Bakersfield, CA 93301

Kings County District Attorney
1400 West Lacey Boulevard
Hanford, CA 93230

Lake County District Attorney
255 North Forbes Street
Lakeport, CA 95453

Los Angeles County District Attorney
211 West Temple Street
Suite 1200
Los Angeles, CA 90012

Madera County District Attorney
209 West Yosemite Avenue
Madera, CA 93637

Marin County District Attorney
3501 Civic Center Drive, Room 130
San Rafael, CA 94903

Mariposa County District Attorney
5101 Jones Street, P.O. Box 730
Mariposa, CA 95338

Mendocino County District Attorney
100 North State Street, P.O. Box 1000
Ukiah, CA 95482

Merced County District Attorney
550 W. Main Street
Merced, CA 95340

Modoc County District Attorney
204 S. Court Street, Suite 202
Alturas, CA 96101

Mono County District Attorney
278 Main St
Bridgeport, CA 93517

Nevada County District Attorney
201 Commercial Street
Nevada City, CA 95959

Orange County District Attorney
401 Civic Center Drive
West Santa Ana, CA 92701

Placer County District Attorney
10810 Justice Center Drive, Suite 240
Roseville, CA 95678

Plumas County District Attorney
520 Main Street, Room 404
Quincy, CA 95971

San Benito County District Attorney
419 4th Street, Second Floor
Hollister, CA 95203

San Bernardino County District Attorney
303 West 3rd Street, 6th Floor
San Bernardino, CA 92415-0502

San Mateo County District Attorney
400 County Center, Third Floor
Redwood City, CA 94063

Shasta County District Attorney
1355 West Street
Redding, CA 96001

Sierra County District Attorney
100 Courthouse Square
Downieville, CA 95936

Siskiyou County District Attorney
P.O. Box 986
Yreka, CA 96097

Solano County District Attorney
675 Texas Street, Suite 4500
Fairfield, CA 94533

Stanislaus County District Attorney
832 12th Street, Suite 300
Modesto, CA 95354

Sutter County District Attorney
466 Second Street, Suite 102
Yuba City, CA 95991

Tehama County District Attorney
444 Oak Street, Room L
Red Bluff, CA 96080

Trinity County District Attorney
P.O. Box 310
Weaverville, CA 96093

Tuolumne County District Attorney
423 North Washington Street
Sonora, CA 95370

Yuba County District Attorney
215 Fifth Street
Marysville, CA 95901

Office of the City Attorney, Los Angeles
City Hall East
200 North Main Street
Los Angeles, CA 90012

Office of the City Attorney, Sacramento
915 I Street, 4th Floor
Sacramento, CA 95814

Office of the City Attorney, San Jose
200 East Santa Clara Street, 16th Floor
San Jose, CA 95113